Comments from Anisa Divine – 17 June 2005

Deadline for Public Comments is July 22, 2005.

OSA Comments for Marked-up WORD files

• Chapter 3. Ag WUE

Colorado River Quantification Settlement Agreement – pp 3-5 and 3-6, including footnote

Colorado QSA Results - p 3-7, including Table 4

Chapter 23. Water Transfers

Potential Benefits – all changes, including Table 1 and footnotes 7 and 9

Chapter 11. Colorado River Hydrologic Region

Salton Sea side box - added entry - p 11-9

IID/SDCWA transfer & Salton Sea mitigation - p 11-10

Paragraph beginning "Through legislation ... -- added entries - p 11-13

Paragraph beginning "The legislation ... -- added entry re preferred alternative - p 11-13

Accomplishments & Table 11-7 – p 11-14 (re PVID fallowing, check w/ MWD)

Key Elements box – p 11-17 – all changes

Looking to the Future - all changes

Glossary

Colorado River supply – add "California's allocation is 4.4 mafy plus 50% of any declared surplus."

Other NEW COMMENTS:

• Web Page Listings – under Information Sources

When we went looking for the links in Ag Land Stewardship, Ag WUE, Water Transfers narrative and Colorado River Hydrologic Region, we couldn't find some. Our summer student checked the links and upgraded them where necessary and where she could figure out what they should be. The links for these revised chapters are all workable addresses except for the ones with comments.

I believe these will be active in the final pdf file. Then, someone should check them one more time.

Continued on next page...

California Water Plan – Update 2005 (Bulletin 160-05)

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Glossary

Need to include:

Recoverable flow and Irrecoverable flow

These are important concepts in this document, and a definition for each is essential.

Colorado River supply – add "California's allocation is 4.4 mafy plus 50% of any declared surplus."

Earthquake – this is not the standard definition, plus it is a circular definition. NOT GOOD.

• Ag Water Use Efficiency Narrative (Chapter 3)

Page 3-8: "... savings from the QSA ..."

Water savings from the QSA does not provide additional water. Be sure to indicate that water conserved by IID through QSA procedures (AAC lining, fallowing, and conservation practices) does not provide new water – it only contributes to California being able to live within its annual allocation of Colorado River water – 4.4 MAFY plus up to $\frac{1}{2}$ of any surplus declared by the Secretary of Interior.

This and all of my other proposed changes are included on the WORD file.

Water Transfers Narrative (Chapter 23)

Page 23-1: Long-term water transfers (longer than 1 year) require CEQA and state board approval.

Page 23-5: As with the AG WUE Narrative – This narrative must include the caveat that water conserved pursuant to the QSA program and projects (AAC lining, fallowing, and conservation practices) does not provide new water – it only contributes to California being able to live within its annual allocation of Colorado River water – 4.4 MAFY plus up to ½ of any surplus declared by the Secretary of Agriculture

Page 23-6, Table 1: Add caveat once again – the IID and PVID water this will not be new water. I do not know about the other sources.

Page 23-6: Paragraph beginning, "A statewide economic-engineering study...": This paragraph contains a lot of jargon. I am not certain what kind of flexibility is implied (delivery flexibility, or what), nor do I see how these results represent a simplification of California's Water management system.

Page 23-8: Quantifying Uncertainties, "Quantifying the actual water savings from crop shifting and crop idling is particularly difficult...": I have come to believe that crop shifting and idling are some of the easiest practices to verify, as the amount conserved can be calculated using climate or historic crop water use data. The accuracy of the calculation will depend only on the type of climate data that are available. Te IID/MWD experience indicates that changes in system operation and automation require flow measurement and data quality control that are equally as difficult as determining crop ET. For IID, water savings from crop idling has been one of the simplest to determine, as the change was based on records of past use on the land being fallowed.

Page 23-9, Point 1 d, "Provide for community participation... conflicts caused by transfers within their jurisdictions: Conflicts also arise over transfers outside their jurisdictions (inter-agency, inter-regional).

Changes to accommodate these comments and of my other proposed changes are included on the WORD file.

California Water Plan – Update 2005 (Bulletin 160-05)

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Colorado River Hydrologic Region

Page 11-3: "About 85 percent of the region's water supply is from surface deliveries from the Colorado River..."

This is applied water – be sure to state that.

Page 11-9 Side Box: Include requirement that the Resources Agency is to prepare a Salton Sea Ecosystem Study and Environmental Document **and preferred alternative** by Dec. 31, 2006 (attorney's edit)

Page 11-12: Add a paragraph about the wetlands developed by The Citizen's Congressional Task Force on the New River

Page 11-13 Accomplishments: Revised to read, "There have been several large-scale water conservation actions involving Colorado River water users, as shown in Table 11-7. Development and implementation of these programs and projects have included environmental and environmental justice values."

Page 11-16 Salton Sea Authority activity & plans (next to last paragraph): Needs updating.

Page 11-21 Map of Region: It would be nice to indicate that Inflow from Mexico is polluted & unusable.

Changes to accommodate these comments and of my other proposed changes are included on the WORD file.

Previously Submitted Comments:

May 13, 2005

Desal Narrative - I am researching desalination in California. What I want to know is not included in the write up, and there is no web link for any of the listed source material. If references are not included in this update, I certainly hope they are in the next.

June 6, 2005

Ag Land Stewardship Narrative - I am unsure whether "Information Sources" listed on the last page are places where the reader should look for further information or whether it is the source used by the author of the narrative. The reason for this is that at least one of the sources CA Dept of Food and Ag was not mentioned in the narrative. If I, who have worked & worked with this report, am confused about this point, I think a different heading for these boxes would be helpful. Maybe something like "Further Information Sources"

After going to the CA Dept of Food & Ag website & typing in "Ag Lands Stewardship", I am pretty sure that these entries represent sources for further Information, and not sources for the author.

As an aside (that is, nothing to do with the State Water Plan): Oddly, from my perspective, I found the following listed as "Sponsored Links" on the cdfa.ca.gov website when I typed in ag land stewardship:

Sponsored Links <u>Generous Giving</u> Biblical perspectives on generosity and **stewardship**. <u>www.generousgiving.org</u>

How to Teach Stewardship

Download practical ideas on how to

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teach & preach **stewardship**. BuildingChurchLeaders.com

Church **Stewardship**

Stewardship, tithing, fund raising, programs, brochures & giving. www.ChurchStewardship.com

CDFA Response:

Dr. Divine: On the "Programs and Services" page linked from the left side of the CDFA home page there is a link to "Agriculture and Environmental Stewardship" and on the right side of this same home page under "List of Featured Links" there's a link to the Agriculture & Environmental Stewardship Office. If any program in our six divisions requests a higher "profile" on the home page, their staff normally notifies me and we discuss how best to accomplish this.

Documents posted long-term to the CDFA site can be added to the database that will take users directly to that item when search terms are used. Google itself is only able to return appropriate results if it can locate these keywords in a document. - - JJH

DWR Response: Another link to CDFA or to Ag Land Stewardship articles will be found

June 8, 2005

Loss (as in water loss) - As noted in Volume 1, page 143 out of 249, the AC expressed concern about the use of the word "loss" as related to water, and DWR agreed to come up with a better term for the final Water Plan Update 2005. See Strategic Plan (link below), page 143 out of 249, footnote 2.

http://www.waterplan.water.ca.gov/docs/cwpu2005/Vol_1/v1PRD.combined.pdf

I checked everything, and we're in pretty good shape except for Volume 3 - the regional reports & water portfolios, where loss is misused 454 times.

Aside from that, I only found 20 instances of the misuse of the term loss -- as in loss of water. I have listed these on the attached spreadsheet, along with a possible remedy for each, which I provided to Paul Dabbs (Loss_pdbrevdraft_may2005)

June 9, 2005

Public Review Documents – web links are not active in the pdf files; **DWR Response**: They will be active in the Final documents (an upgraded version of pdf will be used

Ag Water Use Efficiency Narrative - This version is guite nice. I have the following comments:

- 1 On page 5 out of 12, first paragraph under "Potential Benefits" "water use efficiency savings of 47,000 af through the QSA" July 22 WORD file with edits provided to Paul Dabbs, et al.
- 2 Use of term "loss" in the Ag WUE narrative see July 22 I substituted alternative language to match DWR usage

Chapter 11. Colorado River Hydrologic Region –see page 11-3, section title "Water Supply and Use," starting with 1st paragraph, 2nd sentence, including Tables 11-1 through Table 11-5, and ending with Table 11-5 on page 11-6 and Table 11-7 (Water transfer agreements -- amounts, costs, who pays) – see July 22 – WORD file with edits provided to Paul Dabbs, et al.